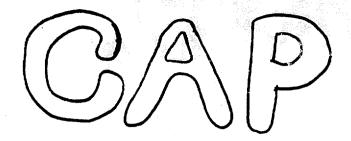
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(COMPLIANCE AUDIT PROGRAM)

# TSCA CONFIDENTIAL BUSINESS INFORMATION

ORIGINAL - DCO (Jeff/Eric)

COPY # 1 - CBIC

COPY # 2 - Scott Sherlock

10406 COMPANY SANITIZED

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ATOCHEM NORTH AMERICA, INC. 900 First Avenue, P.O. Box 1536 King of Prussia, PA 19406-0018

Tel: 215-337-6500

July 20, 1992

**CERTIFIED MAIL** 

RETURN RECEIPT REQUESTED

Document Processing Center (TS-790) Office of Toxic Substances U.S. Environmental Protection Agency 401 M St., S.W. Washington, D.C. 20460



Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e)

Compliance Audit Program

CAP Identification Number: 8ECAP-0026

Dear Sir/Madam:

Pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by Elf Atochem North America Inc. (Atochem) and Environmental Protection Agency (EPA), Atochem is submitting the enclosed final report on studies to establish eye irritation potential for n-decylmercaptan and n-dodecylmercaptan in rabbits to the EPA. These studies do not involve effects in humans.

Nothing in this letter or the enclosed studies are considered confidential business information of Atochem.

The enclosed studies provide information on the chemicals n-decylmercaptan and ndodecylmercaptan. The exact chemical name of n-decylmercaptan is 1-decanethiol and its The exact chemical name of n-dodecylmercaptan is 1-CAS number is 143-10-2. dodecanethiol and its CAS number is 112-55-0.

The title of the enclosed report is Alkyl Mercaptans: Vapor Toxicity and Irritant Properties. This report consists of several studies. The following is a summary of the adverse effects observed in the eye irritation studies with n-decylmercaptan and n-dodecylmercaptan.

TSCA CAP N-Dodecylmercaptan and N-Decylmercaptan July 20, 1992 Page Two

Application of n-decylmercaptan and n-dodecylmercaptan into the eyes of three rabbits was corrosive to the rabbit eye.

To our knowledge, Atochem has not previously submitted any TSCA Section 8(e) notices or premanufacture notifications on the subject chemicals.

Further questions regarding this submission may be directed to me at 215 337-6892.

Sincerely,

C.H. Farr, PhD, DABT Manager, Product Safety and Toxicology

**Enclosures** 

LOGY RESEARCH, INC. HILL 1994 July -

CONFIDENTIAL FOR: PENNSALT CHEMICALS CORPORATION ATTENTIONS IN. JOHN L. EATON

RET ALKYL LERGAPTANES VAPOR TOXICITY AND INSTANT PROPERTIES.

A HONOLOGOUS SERIES OF SIX ALKYL MERCAPTANS HAVE BEEN INVESTIGATED IN REFERENCE TO (1) VAPOR-TOKIGITY IN MISE, (2) PRIMARY SKIN-IRRITATION PROPERTIES WITH RASSITS / MINES AND (3) EYE-IRRITATION PROPERTIES WITH MASSITS. THE SERIES OF COMPOUNDS SCHOLSTED OF THE FOLLOWINGS

N-PROPYL MERGAPTAN · 2 2 2.227 N-BUTYL MERGAPTAN 20 E C 2662 2833 N-AMYL MERGAPTAN 2226 MERGAPTAN K-OCTYL EC. 14 PU N-DESYL MERGAPTAN N-BOBECYL MERCAPTAND

COMPLETE DATA OSTAINED IN EACH EXPERIMENT APE SET FORTH IN THE APPENDED STANDARD LABORATORY FORMS; THE PRESENT REPORT WILL DETAIL THE METHODS USED AND WILL SUMMARISE AS WELL AS ATTEMPT A COMPARATIVE INTEGRATION OF THE FINDINGS.

#### METHODS

#### VAPOR TOXIGITY.

VARIOUS ATMOSPHERIS CONCENTRATIONS OF EACH PRODUCT WERE PREPARED IN HERMETICALLY SEALED CHAMBERS OF THENTY-LITER GAPAGITY; SATURATED CONSENTRATIONS OF THE HIGHER HOWOLOGS WERE ACHIEVED BY PLACING ONE-GRAM QUANTITIES WITHIN THE SEALED CHAMBER AND ALLOWING TRENTY-FOUR HOURS FOR EQUILIBRATION AT ROOM TEMPERATURE PRIOR TO USE. MORNAL, HEALTHY, MALE MIGE OF THE CF1 CTRAIN SERVED AS THE EXPERIMENTAL ANIMAL. FIVE MIDE HERE EXPOSED SIMULTANEOUSLY IN EACH VAPOR CHANGER FOR A PERIOD OF CHE-HOUR DURING WHICH TIME THEY BERE UNDER GOKTINGOUS COSENVATION FOR THE DEVELOPMENT OF TOXIC EFFECTS! SURVIVORS HERE KEPT FOR AT LEAST FIVE DAYS TO NOTE THE APPEARANCE OF RESIDUAL REACTIONS OR LATE DEATHS AS EELL AS TO ASSURE COMPLETE RECOVERY AS REFLECTED BY NOVMAL BODY-WEIGHT-GAIN. THE CONCENTRATIONS USED WERE LOGARITHAICALLY (INCREASING INCREMENTS OF APPROXIMATELY SOE) SPACED AND EMBRACED THE ENTIRE NON-TOXICE TOXIC RANGE TO PERMIT CALCULATION OF THE WEDIAN-LETHAL-CONCENTRATION (LC. ).

PRIMARY SKIN IRRITATIONS

USING RABUITS AS THE EXPERIMENTAL ANIMAL, EACH PRODUCT WAS APPLIED TO THREE INTACT CKIN AREAS AND TO THREE ABRADED SKIN AREAS FOR A PERIOD OF THENTY-FOUR HOURS. THIS WAS AGGOVALISHED BY PLACING 0.5 GG VOLUMES OF THE PROBUCT UPON A GAUGE PAD SHIGH BAS THEN SEGURED TO THE EXPERIMENTAL SITE SITH ADMESTIVE TAPE AND FURTHER SEGURED BY AN OVER-LYING RUBBER GIRDLE. AT THE GONGLUSION OF THE THENTY-FOOR HOUR EXPORUME PERIOD, THE PATON WAS REMOVED AND THE SKIN INSPECTED FOR BIGHS OF IRRITATION; SUON COSERVATIONS WERE CONTINUED FOR THREE DAYS AND REAR SCORED BY THE METHOD OF MAIRE, ET AL.

N-Decyl Meccaptan CAS # 143-10-2 N-Dodecyl Mercaptan CAS# 112-55-0

DARBY, PA

#### COPNEAL IRRITATION.

EACH PRODUCT WAS INSTILLED INTO THE EYES OF THREE RASSITS FOR A SONTAGY PERIOD OF SIXTY SECONDS AT WHICH TIME THE SUMPLUS WAS REMOVED WITH A SOTTOM SWAD! IN ADDITION, EACH PRODUCT WAS INSTILLED INTO ONE MASSIT EYE FOR A PERIOD OF TEN SECONDS WHEN THE EYESS WAS FLUSHED AWAY WITH SALINE. THE TREATED EYES WERE THEN EXAMINED PERIODICALLY AND THE DEGREES OF IRRITATION WERE SCORED BY THE METHOD ESTABLISHED BY DRAIZE, ET AL.

#### RESULTS

A progressive increase in vapor-toxicity was observed with the first times members of the homologous beries of compounds with  $LC_{ab}$  values as follows:

PROPYL, 17,660 PPM BUTYL, 16,670 PPM AWYL, 9,040 PPM

THESE COMPOUNDS SHOULD DISTINCT CHALLARITIES IN THE NATURE OF THE SYMPTOMS PROGNED AND EACH GAUGED DAMAGE TO THE CENTRAL NERVOUS SYSTEM AS SHOWN BY THE PRESENCE OF RESIDUAL EFFECTS ANCHE SURVIVING ANIMALS. THE HEXT MEMBER OF THE SERIES, N-OCTYL MERGAPTAN, GAUSED THE DEVELOPMENT OF TOXIO-SYMPTOMS DURING EXPOSURE TO SATURATED CONCENTRATIONS BUT NO MORTALITIES OCCURRED; RESIDUAL EFFECTS DID NOT APPEAR. THE DECYL AND DODECYL COMPOUNDS RERE COMPLETELY INERT AT SATURATED ATMOSPHERIC CONCENTRATIONS BY GROSS CROSTRATION.

IN REFERENCE TO THE PRIMARY IMPITATION STUDIES, NONE OF THE SOMPOUNDS PRODUCED SIGNS OF IRRITATION WHEN APPLIED TO EITHER INTACT-OKIN OR TO ADRADED-OKIN FOR A CONTACT PERIOD OF THENTY-FOUR HOURS.

WHEN INSTILLED IN THE RABGIT-EYE, EAGH PRODUCT OF THE SERIES PRODUCED MARKED IRRITATION WITH THE PROPYL HOMOLOG BEING THE LEAST IRRITATING (COMPLETE RECOVERY WITHIN TWO DAYS) AND THE DECYL AND DODECYL HOMOLOGS BEING THE WOST IRRITATING (NO SIGNS OF REGOVERY WITHIN SEVEN DAYS); WITH THE LATTER TWO COMPOUNDS, STRUCTURAL DAYAGE OF THE IRIS DECAME MANIFEST SEVERAL DAYS FOLLOWING INSTILLATION AND IT WAS THIS EFFECT WHICH INDICATED PRODABLE PERMANENT INJURY. CURIOUSLY, HAIR-LOSS OGGUNNED AROUND THE EYES OF THE RABBITS TREATED WITH THE OCTYL, DEGYL AND DODECYL HOMOLOGS ONLY.

SUMMAY

THE DATA COTAINED IS SUMMARIZED AS FOLLOWS:

N-R-AEROAPTAN	LC VAPOR		TORIGITY 4:	SKIN INNITATION	EVE IRRITATION	
	ug/L	<b>PP'</b> .1	- ENARKS	INTAGT ABRADED	Max Soone" Lunation	
PROPYL	60	17,550	CNS DAMAGE	0 0	1) 2 DAYS	
BUTYL	67	16,470	CNS DAMAGE	0 0	20 4 DATO	
AMAF	42	9,040	) CNC Dawage	0 0	17 3 DAVE	
OCTYL	>BAT.		TOXIG SYMPTOM	i 000 -	15++m 4 DAYS	
DECYL	>sat.	-	••	0 0	26++n >7 DAYS	
DODEGAF	>BAY.			0 0	25+M >7 DAVS	

<sup>&</sup>quot; MAX. POSSIBLE SCORE - 30; HR - HAIR-LE

<sup>\*\*</sup> REPORTED UNDER DATE OF 3/21/57.

DARBY, PA

IT WOULD APPEAR THAT IMPITANT PROPERTIES AND VAPOR-TOKIOITY INGRESSE WITH INCREASED CENGTH OF THE ALKYL CHAIN; HOWEVER, THE COTYL, DECYL, AND DODESYL MEMBERS OF THE PRESENT HOMOLOGOUS SERIES WERE FOUND TO BE NON-TOKIO BY IMMALATION PRESUMABLY DECAUSE OF THEIR LOW VOLITILITY.

PHARMODLUCY RESEARCH, INC.

## CERTIFICATE OF AUTHENTICITY

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